

1 GARY E. SCHNITZER, ESQ.
2 Nevada Bar No. 395
3 KRAVITZ, SCHNITZER & JOHNSON, CHTD.
4 8985 South Eastern Avenue, Suite 200
5 Las Vegas, Nevada 89123
6 (702) 222-4142 Direct
7 (702) 362-2203 Facsimile
8 Email: gschnitzer@ksjattorneys.com
9 *Attorney for Defendant,*
10 *FORD MOTOR CREDIT COMPANY LLC*

7
8 UNITED STATES DISTRICT COURT
9
10 DISTRICT OF NEVADA

11 GEORGE A. WAGNER,

12 Plaintiff,

13 vs.

14 FORD MOTOR CREDIT COMPANY LLC,
15 UNIVERSAL PAYMENT CORPORATION,
16 WESTSTAR CREDIT UNION, EQUIFAX
17 INFORMATION SERVICES LLC AND
18 EXPERIAN INFORMATION SOLUTIONS,
19 INC.

Defendants.

Case No.: 2:18-cv-00173-APG-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER OR
OTHERWISE PLEAD
(FIRST REQUEST)**

20 COMES NOW, Defendant, FORD MOTOR CREDIT COMPANY LLC, by and through
21 its attorney of record, GARY E. SCHNITZER, ESQ., of the law firm of KRAVITZ,
22 SCHNITZER & JOHNSON, CHTD., and the Plaintiff, GEORGE A. WAGNER, by and through
23 his attorney of record, MICHAEL KIND, ESQ., of the law firm of KAZEROUNI LAW
24 GROUP, APC, and hereby submit this Stipulation to Extend Time To File An Answer or
Otherwise Plead.

25 WHEREAS, Plaintiff filed his Complaint on January 31, 2018;

26 WHEREAS, Defendant was served with the Complaint on February 7, 2018;

27 //

28 ~~~

1 WHEREAS, Defendant's deadline to answer or respond to Plaintiff's Complaint is
2 February 28, 2018;

3 WHEREAS, Defendant is in the process of obtaining proper documents in order to address
4 specific allegations made in Plaintiff's Complaint;

5 WHEREAS, Defendant seeks up to and including March 15, 2018 to file its Response and
6 Plaintiff has no opposition to this extension;

7 WHEREAS, this is the first request by the Parties seeking such extension;

8 THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY
9 STIPULATED AND AGREED by and between the Parties as follows:

10 Defendant, FORD MOTOR CREDIT COMPANY LLC shall have up to and including
11 March 15, 2018 to file an Answer or Otherwise Plead to Plaintiff's Complaint.

12 **IT IS SO STIPULATED.**

14 DATED this 21st day of February, 2018.

15 /s/ Michael Kind, Esq.

16 Michael Kind, Esq.

17 Nevada Bar No. 13903

18 KAZEROUNI LAW GROUP, APC

19 6069 South Fort Apache Road, Suite 100

20 Las Vegas, NV 89148

21 *Attorney for Plaintiff*

22 GEORGE A. WAGNER

15 /s/ Gary E. Schnitzer, Esq.

16 Gary E. Schnitzer, Esq.

17 Nevada Bar No. 395

18 KRAVITZ, SCHNITZER & JOHNSON, CHTD.

19 8985 S. Eastern Ave., Ste. 200

20 Las Vegas, NV 89123

21 *Attorney for Defendant*

22 FORD MOTOR CREDIT COMPANY LLC

20 **IT IS ORDERED.**

22 DATED this 23rd day of February, 2018.

23 
24 United States Magistrate Judge